

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS  
(East St. Louis)**

<b>In re:</b>	)	
	)	
<b>ERIC N. FOERSTERLING</b>	)	<b>Case No. 06-30887-lkg</b>
	)	<b>Chapter 13</b>
	)	
<b>Debtor/Plaintiff,</b>	)	<b>Adv. Case No. 12-03107</b>
	)	
<b>NATIONSTAR MORTGAGE, LLC</b>	)	
	)	
<b>Defendant.</b>	)	
	)	

**ANSWER TO DEBTOR'S COMPLAINT FOR DECLARATORY JUDGMENT**

**COMES NOW**, Nationstar Mortgage, LLC, its subsidiaries, affiliates, predecessors in interest, successors or assigns ("Defendant"), by and through its attorneys, Melinda J. Maune, Amy Tucker Ryan, and the law firm of Martin, Leigh, Laws & Fritzlen, P.C., and for its Answer to the Debtor's Complaint for Declaratory Judgment states as follows:

1. Defendant admits the allegations contained in Paragraph One of the Complaint.
2. Defendant admits the allegations contained in Paragraph Two of the Complaint.
3. Defendant admits the allegations contained in Paragraph Three of the Complaint.
4. Defendant admits the allegations contained in Paragraph Four of the Complaint.
5. Defendant admits the allegations contained in Paragraph Five of the Complaint.
6. Defendant admits the allegations contained in Paragraph Six of the Complaint.
7. Defendant admits the allegations contained in Paragraph Seven of the Complaint.
8. Defendant admits the allegations contained in Paragraph Eight of the Complaint.

9. Defendant admits the allegations contained in Paragraph Nine of the Complaint.
10. Defendant admits the allegations contained in Paragraph Ten of the Complaint.
11. Defendant admits the allegations contained in Paragraph Eleven of the Complaint.
12. Defendant admits the allegations contained in Paragraph Twelve of the Complaint.
13. Defendant admits the allegations contained in Paragraph Thirteen of the Complaint.
14. Defendant admits the allegations contained in Paragraph Fourteen of the Complaint.
15. Defendant admits the allegations contained in Paragraph Fifteen of the Complaint.
16. Defendant admits the allegations contained in Paragraph Sixteen of the Complaint.
17. Defendant admits the allegations contained in Paragraph Seventeen of the Complaint.
18. Defendant admits the allegations contained in Paragraph Eighteen of the Complaint.
19. Defendant admits the allegations contained in Paragraph Nineteen of the Complaint.
20. Defendant admits the allegations contained in Paragraph Twenty of the Complaint.
21. Defendant admits the allegations contained in Paragraph Twenty-One of the Complaint.
22. Defendant admits the allegations contained in Paragraph Twenty-Two of the  
Complaint.
23. Defendant admits the allegations contained in Paragraph Twenty-Three of the  
Complaint.
24. Defendant admits the allegations contained in Paragraph Twenty-Four of the  
Complaint.
25. Defendant admits the allegations contained in Paragraph Twenty-Five of the  
Complaint.
26. Defendant admits the allegations contained in Paragraph Twenty-Six of the Complaint.
27. Defendant admits the allegations contained in Paragraph Twenty-Seven of the

Complaint.

28. Defendant admits the allegations contained in Paragraph Twenty-Eight of the

Complaint.

29. Defendant is without sufficient information to admit or deny the allegations contained in Paragraph Twenty-Nine and therefore denies the same.

30. Defendant is without sufficient information to admit or deny the allegations contained in Paragraph Thirty and therefore denies the same.

31. Defendant is without sufficient information to admit or deny the allegations contained in Paragraph Thirty-one and therefore denies the same.

32. Defendant is without sufficient information to admit or deny the allegations contained in Paragraph Thirty-two and therefore denies the same.

33. Defendant is without sufficient information to admit or deny the allegations contained in Paragraph Thirty-three and therefore denies the same. By way of further answer, Defendant shows the account current, with the next payment owed being the August, 2012 payment.

34. Defendant has requested said documentation and will provide to Counsel upon receipt.

35. Defendant has requested said documentation and will provide to Counsel upon receipt

**WHEREFORE**, Movant respectfully requests that this Court deny the Debtor's Complaint for Declaratory Judgment, any requests made in said Complaint and for such other and further relief as is just and appropriate under the circumstances.

Respectfully submitted,

MARTIN, LEIGH, LAWS & FRITZLEN, P.C.  
s/ Melinda J. Maune

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ATTORNEYS FOR CREDITOR

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served through the Court's ECF system on this 19th day of July, 2012:

William Mueller  
James Haller  
5312 West Main Street  
Belleville, IL 62226

Russell C. Simon  
Chapter 13 Trustee  
33 Bronze Pointe, Suite 110  
Swansea, IL 62221

U.S. Trustee  
Office of the U.S. Trustee  
111 South 10<sup>th</sup> Street, Suite 6353  
St. Louis, MO 63102

And via United States mail, postage prepaid to:

Eric N. Foersterling  
373 Orchard Court  
Troy, IL 62294

s/ Melinda J. Maune  
Attorney for Movant